

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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JOSEPH AND URSY A. VITALE	:	
	:	NO. 2:15-cv-01815-RAL
v.	:	
	:	JURY TRIAL DEMANDED
ELECTROLUX HOME PRODUCTS, INC.	:	

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**DEFENDANT, ELECTROLUX HOME PRODUCTS, INC.’S MOTION  
TO PRECLUDE TESTIMONY OF MICHAEL R. STODDARD, JR.  
AND WILLIAM J. VIGILANTE, JR., PH.D.**

Defendant, Electrolux Home Products, Inc. (“Electrolux”), by and through its counsel, Nicolson Law Group LLC, files the within Motion to preclude the testimony of Plaintiffs’ experts, Michael R. Stoddard, Jr. and William J. Vigilante, Jr., Ph.D. and avers as follows:

1. Electrolux hereby moves this Honorable Court for an entry of an Order precluding the testimony of Plaintiffs’ experts, Michael R. Stoddard, Jr. and William J. Vigilante, Jr., Ph.D. at trial.

2. In support thereof, Electrolux simultaneously files herewith and incorporates herein by reference its supporting Memorandum of Law.

Respectfully submitted,

NICOLSON LAW GROUP LLC

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DATE: March 20, 2017

Attorneys for Defendant,  
Electrolux Home Products, Inc.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Defendant, Electrolux Home Products, Inc.'s Motion to preclude the testimony of Plaintiffs' experts, Michael R. Stoddard, Jr. and William J. Vigilante, Jr., Ph.D. was served electronically on the date stated below, upon the following:

Raymond E. Mack, Esquire  
Patrick A. Hughes, Esquire  
de Luca Levine, LLC  
Three Valley Square  
512 E. Township Line Road, Suite 220  
Blue Bell, PA 19422

NICOLSON LAW GROUP LLC

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Electrolux Home Products, Inc.

DATE: March 20, 2017